

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

|  |   |                               |
|--|---|-------------------------------|
| <b>NICHOLAS KNOPICK,</b>                 | : |                               |
| <b>Plaintiff</b>                         | : |                               |
|  | : | <b>NO.: 1:09 CV 01287</b>     |
| <b>v.</b>                                | : |                               |
|  | : |                               |
| <b>JOHN J. CONNELLY, JR.; SUSAN M.</b>   | : | <b>JUDGE SYLVIA H. RAMBO</b>  |
| <b>KADEL; JAMES, SMITH, DURKIN &amp;</b> | : |                               |
| <b>CONNELLY, L.L.P.; and</b>             | : | <b>CIVIL ACTION - LAW</b>     |
| <b>PHILIP A. DOWNEY,</b>                 | : |                               |
| <b>Defendants</b>                        | : | <b>JURY TRIAL DEMANDED</b>    |
|  | : | <b>(Electronically Filed)</b> |

**CERTIFICATE OF MERIT AS TO  
JOHN J. CONNELLY, ESQUIRE**

I, Dennis E. Boyle, Esquire, hereby certify that claims are raised under both subdivisions (a)(1) and (a)(2) of Pa.R.Civ.P. 1042.3. As to subdivision (a)(1), an appropriate licensed professional has supplied a written statement that there exists a reasonable probability that the care, skill or knowledge exercised by John J. Connelly, Esquire in the treatment, practice or work that is the subject of the Complaint fell outside acceptable professional standards and that conduct was a cause in bringing

about the harm. As to subdivision (a)(2), an appropriate licensed professional has supplied a written statement that there exists a reasonable probability that the care, skill or knowledge exercised or exhibited by other licensed professionals for whom John J. Connelly, Esquire is responsible, in the treatment, practice or work that is the subject of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm.

**BOYLE, NEBLETT & WENGER**

/s/ Dennis E. Boyle

**Dennis E. Boyle, Esquire**  
Supreme Court I.D. No. 49618

**Joshua M. Autry, Esquire**  
Supreme Court I.D. No. 208459  
4660 Trindle Road, Suite 200  
Camp Hill, PA 17011  
Phone: (717) 737-2430  
Facsimile: (717) 737-2452  
Email: [deboyle@dennisboylelaw.com](mailto:deboyle@dennisboylelaw.com)  
Email: [jmautry@dennisboylelaw.com](mailto:jmautry@dennisboylelaw.com)

Counsel For: Plaintiff

Dated: September 2, 2009

**CERTIFICATE OF SERVICE**

I hereby certify that on the date listed below I electronically filed the foregoing with the Court using the CM/ECF system, which sent notification of such filing to the following person(s) at the following email address(es):

Edwin A.D. Schwartz  
[easchwartz@mdwcg.com](mailto:easchwartz@mdwcg.com)

And I hereby certify that I have mailed by United States First Class Mail the document to the following person(s) at the following address(es):

Philip A. Downey, Esquire  
1555 Embreeville Road  
Unionville, PA 19375

*/s/ Penny A. Rogers*  
\_\_\_\_\_  
Penny A. Rogers, Paralegal

Dated: September 2, 2009